



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, WA 98101

April 18, 2002

Reply To  
Attn Of: OW-137

Kenneth T. Fellows, Project Engineer  
Parametrix, Inc.  
P.O. Box 460  
Sumner, WA 98390-1516

Re: Draft Outline - Application for Rule Authorization  
Tulalip Tribe Large Capacity Wastewater Infiltration System

Dear Mr. Fellows:

Thank you for your follow-up letter and the enclosed draft outline for the *Application for Rule Authorization of The Tulalip Tribes' Wastewater Infiltration System*, dated March 19, 2002. The U.S. Environmental Protection Agency (EPA) appreciates the Tribe's proactive efforts to discuss and resolve potential issues prior to the submittal of the final application. These steps will ensure that the rule authorization document can be reviewed and approved in a timely manner.

Based on the meeting of February 20, 2002 and your letter, it is our understanding that the Tribe will utilize membrane technology to treat wastewater prior to injection, the large capacity wastewater infiltration system will generate up to 250,000 gallons per day. In addition, we understand that the Tribe is interested in applying for a National Pollutant Discharge Elimination System (NPDES) permit in approximately three years. As you are aware, the Underground Injection Control (UIC) regulations outlined in Code of Federal Regulations (CFR) Part 144 requires that all injection activities be protective of underground sources of drinking water (USDW), which in this case means that the injected sanitary waste must meet the parameters outlined under the National Primary Drinking Water Standards. It is also our understanding that the treatment technology chosen for the wastewater infiltration system will be able to treat sanitary waste to meet these parameters.

Upon reviewing the draft outline, it appears that all of the basic requirements for a rule authorization document is contained in the outline. These requirements should help describe the functions of the wastewater treatment technology, goals intended to be achieved, and potential impacts to the USDW. As you may know, quality control and assurance are important aspects when collecting environmental data. As we understand that long-term monitoring is included in this project, we want you to be aware that EPA requires that all environmental data is collected,

managed, and analyzed in a consistent manner. In order to comply to this requirement, Quality Assurance Project Plan (QAPP) and a Quality Management Plan (QMP) must be developed for this project. We have enclosed a table of target compounds, drinking water Maximum Contaminant Level (MCL), and detection limits requirements to serve as a reference guide for ground water quality monitoring. Please refer to our Quality Assurance Program webpage for reference documents related to the basic requirements for developing QAPP and QMP:

[www.epa.gov/r10earth/offices/oea/qaindex.htm](http://www.epa.gov/r10earth/offices/oea/qaindex.htm)

We appreciate the opportunity to review the draft outline and look forward to working with you through the rule authorization process. We appreciate your effort to protect ground water quality. If you have any questions, please do not hesitate to call Calvin Terada at (206) 553-4141.

Sincerely,



Tim Hamlin, Manager  
Ground Water Protection Unit

Enclosure

**Target Compounds, Maximum Contaminant Level (MCL)  
and Detection Limit Requirements**

	MCLs (mg/L)	Method	Detection Limits (mg/L) MEL
<b>Inorganic Compounds</b>			
antimony	0.006	200.8/200.7 *	0.005
barium	2	200.8/200.7	0.005
beryllium	0.004	200.8/207	0.001
cadmium	0.005	200.8/200.7	0.001
chromium	0.1	200.8/200.7	0.005
Copper	1.3	200.8/200.7	0.005
Cyanide	0.2	335.2/335.4	0.01
Mercury	0.002	245.1	0.002
Lead	0.015	200.8/200.7	0.001
selenium	0.05	200.8/200.7	0.005
thallium	0.002	200.8/200.7	0.005
other metals (no MCLs)		200.7 or equivalent	varies
<b>Conventional Parameters</b>			
nitrate	10 (as N)	300.0	0.01
nitrite	1 (as N)	300.0	0.01
<b>Microbiological Tests</b>			
Fecal Coliform	zero	9221B	1 MPN/100 ml
E.Coli	zero	9221F	1 MPN/100 ml
Total Coliforms	zero	9221E	1 MPN/100 ml
<b>Organic Compounds</b>			
VOCs		524.2	
trichloroethene	0.005	524.2	0.00025
carbon tetrachloride	0.005	524.2	0.00025
1,2-dichloroethane	0.005	524.2	0.00025
chlorobenzene	0.1	524.2	0.00025
dichloromethane	0.005	524.2	0.00025
vinyl chloride	0.002	524.2	0.00025
hexachlorobenzene	0.001	524.2	0.00025
benzene	0.005	524.2	0.00025
1,1,1 - trichloroethane	0.2	524.2	0.00025

	MCLs (mg/L)	Method	Detection Limits (mg/L) MEL
1,1-dichloroethene	0.075	524.2	0.00025
dibromochloro-3-propane	0.0002	504.1	0.0002
cis-1,2-dichloroethene	0.07	524.2	0.00025
trans-1,2-dichloroethene	0.1	524.2	0.00025
1,2-dichloropropane	0.005	524.2	0.00025
ethyl benzene	0.7	524.2	0.00025
ethylene dibromide (EDB)	1.0	524.2	0.00025
toluene	1.0	524.2	0.00025
tetrachloroethene	0.005	524.2	0.00025
xylenes	10	524.2	0.00025
styrene	0.1	524.2	0.00025
1,2,4 -trichlorobenzene	0.07	524.2	0.00025
1,1,2-trichloroethane	0.005	524.2	0.00025
1,4-dichlorobenzene	0.075	524.2	0.00025
1,2-dichlorobenzene	0.6	524.2	0.00025
<b>Pest</b>		<b>508A</b>	
chlordane	0.002	508A	0.000005
heptachlor	0.0004	508A	0.000005
lindane	0.0002	508A	0.000009
heptachlor epoxide	0.0002	508A	0.000005
methoxychlor	0.04	508A	0.000013
<b>PCBs</b>		<b>508A</b>	
Aroclor 1016	0.0005	508A	0.000122
Aroclor 1221	0.0005	508A	0.000122
Aroclor 1232	0.0005	508A	0.000122
Aroclor 1242	0.0005	508A	0.000122
Aroclor 1248	0.0005	508A	0.000122
Aroclor 1253	0.0005	508A	0.000122
Aroclor 1260	0.0005	508A	0.000122
<b>Total TPH</b>		<b>WDOE Method</b>	
Volatile Petroleum Hydrocarbon extended (VPH)	MTCA	WDOE Method	1.0
Extractable Petroleum Hydrocarbon extended (EPH)	MTCA	WDOE Method	1.0
NW- TPH extended	MTCA	WDOE Method	1.0

\* - Use 200.7 when the analyte is detected 5x higher than MDL.